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**IN THE UNITED STATES DISTRICT
COURT DISTRICT OF UTAH**

LAURA A. GADDY, individually and
on behalf of all others similarly
situated,

Plaintiffs,

v.

**[The] CORPORATION OF THE
PRESIDENT OF THE CHURCH
OF JESUS CHRIST OF LATTER-
DAY SAINTS**, a Utah corporation
sole.

Defendant

**JOINT MOTION FOR
INITIAL
SCHEDULING
CONFERENCE**

(DEMAND FOR JURY TRIAL)

Case: **2:19-cv-00554 RJS**

The Hon. Judge: Robert J. Shelby

Magistrate Judge: Evelyn J. Furse

The parties hereby request that the Court order an initial scheduling conference. The parties through their counsel met twice (telephonically), once on August 22, 2019 and again on September 12, 2019 to discuss attorney planning meeting issues. At that time, defense counsel made clear that even if their 12 (b)

motion is denied, they will request interlocutory appeal. Though Plaintiff does not waive her right to object to such a request for interlocutory appeal (realizing that is the Court's decision), Plaintiff verbally agreed, given the above, that unless the case is stayed pending appeal, that discovery be stayed pending the Court's ruling on the 12(b) motion.

Subsequently, Plaintiff considered the upcoming November 4, deadline for filing her motion for class certification and decided that class discovery needed to be exempt from the agreed-upon discovery stay. Plaintiff now intends to serve Defendant with class discovery within the next few days, and to issue at least one if not two subpoenas, to ensure readiness for the November 4, 2019 deadline.

WHEREFORE: The parties request an initial scheduling conference to discuss issues related to stay of discovery, discovery in phases and class discovery.

Kay Burningham

Date: ____/____/____

David J. Jordan (Signed by filing attorney with permission of defense counsel. /s/Kay Burningham).

Date: ____/____/____